

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

NADER ASGHARI-KAMRANI and
KAMRAN ASGHARI-KAMRANI

Plaintiffs,

v.

UNITED SERVICES AUTOMOBILE
ASSOCIATION

Defendant.

Civ. Act. No. 2:15-cv-478 RGD-LRL

USAA’S MOTION FOR ATTORNEYS’ FEES

Defendant United Services Automobile Association (“USAA”) submits that this case warrants sanctions due to Plaintiffs’ exceptionally weak litigation positions and the manner in which this case was litigated. Accordingly, USAA hereby moves the Court for an award of its attorneys’ fees in the above-captioned action pursuant to 35 U.S.C. § 285, 28 U.S.C. § 1927, FED. R. CIV. P. 37, 54(d)(2), and the Court’s inherent power, jointly and severally between Plaintiffs and their counsel.

A memorandum stating USAA’s factual and legal support for this motion is attached, as is a proposed order.

Respectfully submitted,

FISH & RICHARDSON P.C.

Dated: July 19, 2016

By: /s/ Ahmed J. Davis

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Counsel for Defendant
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ASSOCIATION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been filed with the Court's ECF systems, and thereby served all parties and counsel designated to receive such notices, on July 19, 2016.

/s/ Ahmed J. Davis

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on July 14, 2016 Michael Zoppo and Matthew Berntsen for USAA and Reece Nienstadt for Plaintiffs met and conferred telephonically. Counsel attempted to resolve the issues addressed in this Motion in good faith and an impasse was reached..

/s/ Ahmed J. Davis